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December 3, 2025

United States Bankruptcy Court for the District of Delaware Attention: Chief Judge Karen B. Owens 824 North Market Street 6th Floor, Courtroom 3 Wilmington, DE 19801

Re: <u>Delaware Rule of Professional Conduct Rule 1.12(c)(1) and (2) (Joshua Berland)</u>

To Whom it May Concern:

McDermott Will & Schulte LLP represents Legacy IMBDS Liquidating Trust in *In re Legacy IMBDS, Inc.* (f/k/a iMedia Brands, Inc.), et al. under Case No. 1:2023bk10852 before the Honorable Karen B. Owens ("the Matter"). Joshua Berland ("Mr. Berland") recently joined McDermott as an Associate. Mr. Berland previously clerked for Judge Karen B. Owens of the United States Bankruptcy Court for the District of Delaware.

In compliance with the relevant rules of professional conduct, McDermott has screened Mr. Berland from the Matter. The screening restriction prohibits Mr. Berland from disclosing relevant confidential information to McDermott. In particular, the screening restriction:

- Bars Mr. Berland from working on the Matter;
- Prohibits communications between Mr. Berland and McDermott lawyers and staff handling the Matter, or witnesses in the Matter about the Matter or Mr. Berland's prior, relevant work; and
- Restricts Mr. Berland's access to documents or other information related to the Matter.

I attest that McDermott's attorneys are aware of this screening restriction. Further, McDermott will apportion Mr. Berland no part of the fee from the Matter.

If you have any questions about the screening restriction, do not hesitate to contact me.

Very truly yours,

Joshua Rogaczewski

Deputy General Counsel

)oshua Rogaczewski

CC:

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